

ROY COOPER  
Governor

MICHAEL S. REGAN  
Secretary

MICHAEL ABRACZINSKAS  
Director



TBD

Mr. Edwin Underwood  
Chief Operating Officer  
Marsh Furniture Company  
PO Box 870  
High Point, North Carolina 27261

SUBJECT: Air Quality Permit No. 03238T25  
Facility ID: 4100854  
Marsh Furniture Company  
High Point, Guilford County, North Carolina  
Fee Class: Title V  
PSD Class: Major

Dear Mr. Underwood:

In accordance with your completed Air Quality Permit Applications for a 2<sup>nd</sup>-step significant modification of your Title V permit (received March 6, 2019), renewal of your Title V permit (received June 26, 2019), and 502(b)(10) modification of your Title V permit (received September 2, 2015), we are forwarding herewith Air Quality Permit No. 03238T25 to Marsh Furniture Company, 1001 South Centennial Street, High Point, North Carolina authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the conditions of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.



North Carolina Department of Environmental Quality | Division of Air Quality  
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641  
919.707.8400

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Guilford County has triggered increment tracking under PSD for PM<sub>10</sub> and SO<sub>2</sub>. This new permit will not expand or consume any increment for any tracked pollutant. Any increment changes associated with the significant modification were addressed in 1<sup>st</sup>-step permit application 4100854.17A.

This Air Quality Permit shall be effective from TBD until TBD+5 years, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein. Should you have any questions concerning this matter, please contact Russell Braswell at [russell.braswell@ncdenr.gov](mailto:russell.braswell@ncdenr.gov) or 919-707-8731.

Sincerely yours,

William D. Willets, P. E., Chief, Permitting Section  
Division of Air Quality, NCDEQ

Enclosure

cc: Kelly Fortin, EPA Region 4 (with review)  
Connie Horne (cover letter only)  
Winston-Salem Regional Office  
Central Files

## ATTACHMENT to Cover Letter to Air Quality Permit Number 03238T25

**Insignificant Activities Pursuant to 15A NCAC 02Q .0503(8):**

<b>Emission Source ID</b>	<b>Emission Source Description</b>
<b>I-Distillation</b>	Distillation system for recovery and reuse of non-HAPs thinners in finishing room
<b>I-NVLO</b>	One temporary veneer laminating operation utilizing hand held applicator and pinch roller
<b>I-C-1</b>	Cleanup operations (located at all assembly locations; wipe rags and naphtha)
<b>I-MO</b>	Maintenance operations (welding, fabricating and maintenance activities)
<b>I-TUO</b>	Touchup and repair operations (located at all assembly locations)
<b>I-MUA-1 and I-MUA-2</b>	Two (2) natural gas-fired (4.12 million Btu per hour maximum heat input capacity) make-up air units manufactured by Rupp Air Management Systems. These units are intended to provide comfort heat to the space in winter/cold weather; thus, insignificant per 15A NCAC 02Q .0503(7)(d)
<b>I-Rem</b>	Soil remediation

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the Permittee is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."
3. For additional information regarding the applicability of MACT or GACT see the DAQ page titled "Specific Permit Conditions Regulatory Guide." The link to this site is as follows:  
<http://deg.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide>.

## Summary of Changes to Permit

The following changes were made to the Marsh Furniture Company Air Quality Permit No. 03238T25:

Page No.*	Specific Condition No.*	Changes
n/a	Throughout	<ul style="list-style-type: none"> <li>Updated dates and permit numbers.</li> <li>Fixed formatting.</li> <li>Removed references to 02Q .0504 because the Permittee has submitted the required application.</li> <li>Removed references to the boiler B1 because it has been removed from the facility.</li> </ul>
n/a	Insignificant Activities	<ul style="list-style-type: none"> <li>Added emission source for soil remediation (ID No. I-Rem) based on applicability determination #3445, issued July 23, 2019.</li> </ul>
3 – 7	Permitted Emission Sources	<ul style="list-style-type: none"> <li>Removed the boiler B1 and all associated control devices and references from this table because they have been removed from the facility.</li> <li>Removed references to 02Q .0515 because the effective date has passed.</li> <li>Moved spray booths SB1, SB2, and ECD-SB13 to New Flat Line No. 4 based on letter received January 30, 2020.</li> </ul>
13	2.1 B.3	<ul style="list-style-type: none"> <li>Removed references to 02D .0521 because visible emissions do not have a major source threshold and cannot trigger CAM requirements.</li> <li>Removed the section for "justification" because it contained no enforceable conditions. This information can be found in the associated application review.</li> </ul>
n/a	2.1 D. (former)	<ul style="list-style-type: none"> <li>Removed this section because the boiler B1 has been removed from the facility.</li> </ul>
16	2.1 D.1	<ul style="list-style-type: none"> <li>Added the site-specific minimum voltage and current.</li> </ul>
17	2.1 D.3 (current)	<ul style="list-style-type: none"> <li>Changed condition for 02D .0521 to reference the COMS required by MACT Subpart DDDDD.</li> </ul>
18	2.1 D.4 and 5 (current)	<ul style="list-style-type: none"> <li>Reordered these conditions to match order in NCAC.</li> </ul>
18 – 22	2.1 D.5 (current)	<ul style="list-style-type: none"> <li>Rewrote condition for MACT Subpart DDDDD to reflect the Permittee's chosen compliance methods.</li> </ul>
n/a	2.1 D.6 (former)	<ul style="list-style-type: none"> <li>Removed this condition because the Permittee has submitted the required application.</li> </ul>
33	3	<ul style="list-style-type: none"> <li>Updated General Conditions to v5.3.</li> </ul>

\* This refers to the current permit unless otherwise stated.



State of North Carolina  
Department of Environmental Quality  
Division of Air Quality

## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.	Effective Date	Expiration Date
03238T25	03238T24	TBD	TBD+5 years

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

**Permittee:**

**Marsh Furniture Company**

**Facility ID:**

**4100854**

**Facility Site Location:  
City, County, State, Zip:**

**1001 South Centennial Street  
High Point, Guilford County, North Carolina 27261**

**Mailing Address:  
City, State, Zip:**

**PO Box 870  
High Point, North Carolina 27261**

**Application Numbers:  
Complete Application Date:**

**4100854.15A, .19A, & .19B  
September 2, 2015; March 6, 2019; July 1, 2019**

**Primary SIC Codes:**

**2434**

**Division of Air Quality,  
Regional Office Address:**

**Winston-Salem Regional Office  
450 West Hanes Mill Road, Suite 300  
Winston-Salem, North Carolina 27105**

Permit issued this the **TBD.**

William D. Willets, P. E., Chief, Permitting Section  
By Authority of the Environmental Management Commission

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DRAFT

## SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>New Hanging Line No. 1 including: (Building Three, Former Whitewood Warehouse)</b>				
8-10, 14-15 23-31	<b>NHL1S (PSD; MACT, JJ)</b>	Stage 1 – Two stain booths (Nos. Stage1.1 and Stage1.2)	NA	NA
		Stage 2 – Two stain booths (Nos. Stage2.1 and Stage2.2)	NA	NA
		Stage 3 – Two stain booths (Nos. Stage3.1 and Stage3.2)	NA	NA
		Stage 4 – Two sealer booths (Nos. Stage4.1 and Stage4.2)	NA	NA
		Stage 5 – Two topcoat booths (Nos. Stage5.1 and Stage5.2)	NA	NA
		Stage 6 – Two stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)	NA	NA
		One paint spray booth fitted with high volume low pressure (HVLP) guns (No. NHL-4A)	NA	NA
		One paint spray booth fitted with high volume low pressure (HVLP) guns (No. SB-R1)	NA	NA
		Five natural gas-fired ovens (four at 0.5 and one at 0.8 million Btu per hour maximum heat input capacity, respectively; Nos. Oven.1 through Oven.5)	NA	NA
		Three natural gas-fired process air makeup units (3.4 million Btu per hour maximum heat input capacity each; Nos. Makeup-1, Makeup-2, and Makeup-3)	NA	NA
		One washoff tank (No. ESWO1)	NA	NA

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
New Hanging Line No. 2 including: (Building Five, Third Floor, Existing Finishing Room)				
8-10, 14-15 23-31	NHL2S (PSD; MACT, JJ)	Stage 2 – Two stain booths (Nos. Stage2.1 and Stage2.2)	NA	NA
		Stage 3 – Two stain booths (Nos. Stage3.1 and Stage3.2)	NA	NA
		Stage 4 – Two sealer booths (Nos. Stage4.1 and Stage4.2)	NA	NA
		Stage 5 – Two topcoat booths (Nos. Stage5.1 and Stage5.2)	NA	NA
		Stage 6 – Two stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)	NA	NA
		Three natural gas-fired process air makeup units (3.4 million Btu per hour maximum heat input capacity, each; Nos. Makeup-1, Makeup-2, and Makeup-3)	NA	NA
Glaze Line No. 2 (Building Five, Second Floor, Former Trimout Area)				
8-10, 23-31	GL-NHL2S-1	One baffle type paint spray hanging line fitted with a reciprocator and high volume low pressure (HVLP) guns	NA	NA
	GL-SB11b	One hand spray booth fitted high volume low pressure (HVLP) guns	NA	NA
New Flat Line No. 1 (Building Two, Third Floor, Former Roller Room)				
8-10, 14-15 23-31	NFLS1 (PSD; MACT, JJ)	Stage 1 – Five roll coaters (Nos. Stage1.1 through Stage1.5)	NA	NA
		Stage 6 – Two back to back topcoat spray booths (Nos. Stage6.1 and Stage6.2)	NA	NA
		Stage 7 – Six UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)	NA	NA
		Five steam-heated drying ovens (Nos. Oven.1 through Oven.5)	NA	NA
		Three natural gas-fired process air makeup units (3.4 million Btu per hour maximum heat input capacity each; Nos. Makeup-1, Makeup-2, and Makeup-3)	NA	NA



Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
New Flat Line No. 4 (Building Five, Third Floor, Existing Finishing Room)				
8-10, 14-15 23-31	NFLS4 (PSD; MACT, JJ)	Four roll coaters utilizing products that do not contain volatile organic compounds (Nos. UVRC1 through UVRC4)	NA	NA
		Four ultraviolet light drying ovens (Nos. UVDO1 through UVDO4)	NA	NA
		Two baffle type stain spray booths (Nos. SB1 and SB2)	NA	NA
		One off-line paint spray booth (No. ECD-SB13)		
		One natural gas-fired three zone drying oven (0.5, 0.5 and 0.8 million Btu per hour maximum heat input capacities; No. Oven.6)	NA	NA
Old Shipping Warehouse				
Stain-Paint Line				
8-10, 23-31	NFLS-4 (PSD; MACT, JJ)	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A
	NFLS-2 (PSD; MACT, JJ)	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A
	SWM-1 & SWM-2 (MACT, JJ)	Two stain wiping machines	N/A	N/A
Sealer Line				
8-10, 23-31	NFLS-5 (PSD; MACT, JJ)	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A
Topcoat Line				
8-10, 23-31	NFLS-3 (PSD; MACT, JJ)	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A
Washoff Tanks				
8-10, 23-31	ESWO2, ESWO3, ESWO4, and ESWO5 (MACT, JJ)	Four washoff tanks (each 107 gallon capacity)	NA	NA

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
Existing (Old) Flat Line No. 1 (Building Five, Third Floor)				
8-10, 23-31	EFL1 (PSD; MACT JJ)	One baffle type sealer spray booth (No. SB3)	NA	NA
		One baffle type varnish spray booth (No. SB4)	NA	NA
		Four steam-heated drying ovens (Nos. DO1 through DO4)	NA	NA
Existing (Old) Flat Line No. 3 (Building Five, Third Floor)				
8-10, 23-31	EFL3 (PSD; MACT JJ)	One baffle type stain spray booth (No. SB8)	NA	NA
		One baffle type sealer spray booth (No. SB9)	NA	NA
		One baffle type varnish spray booth (No. SB10)	NA	NA
		One steam-heated stain drying oven (No. DO8)	NA	NA
		One steam-heated sealer drying oven (No. DO9)	NA	NA
		One steam-heated varnish drying oven (No. DO10)	NA	NA
Off-Line Spray Booths and Roll Coaters				
8-10, 23-31	ECD-SB11a (PSD; MACT JJ)	One off-line paint spray booth (Clamp Department 121)	NA	NA
	SB12 (PSD; MACT JJ)	One off-line paint spray booth (Machine Room – Department 116)	NA	NA
	ECD-RC1, ESC-RC2, ECD-RC3, ECD-RC12, and ECD-RC19 (PSD; MACT JJ)	Five roll coaters (Clamp Department 121)	NA	NA

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
Existing Main UV Line (Building Two, Third Floor, Roller Room)				
8-10, 23-31	EMUV (PSD; MACT JJ)	Seven roll coaters (Nos. RC7 through RC11, RC13, and RC14)	NA	NA
		Three steam-heated drying ovens (Nos. DO12 through DO14)	NA	NA
Existing Short Line (Building Two, Third Floor, Roller Room)				
8-10, 23-31	ESL (PSD; MACT JJ)	Four roll coaters (Nos. RC4, RC5A, RC5B, and RC6)	NA	NA
		Two steam-heated drying ovens (Nos. DO11 and DO17)	NA	NA
Existing Facility Support Equipment				
8-10, 23-31	ES-Gluing-1	One gluing operation	NA	NA
16-22	B2 (NSPS, Dc; MACT, DDDDD)	One stoker-type wood fuel-fired boiler (18.45 million Btu per hour heat input)	FA2 and ESP1	One multicyclone (thirteen 9-inch diameter tubes) in series with one electrostatic precipitator (1,868 square feet of collection plate area)
11-13	WWCS1	One wood waste/wood dust collection and storage system	CD1, CD2, CD4, and CD5	Four cyclones (80, 144, 120, and 48 inches in diameter, respectively)
			BF1 through BF5	Five bagfilters (1,936, 3873, 5765, 6924, and 7045 square feet of filter area, respectively)
			CD3 and CD6	Two simple closed loop cyclones (60 and 84 inches in diameter, respectively)
11-13	TL1	One enclosed auger type wood chip truck load-out operation	NA	NA
11-13	ESWH1	One wood hog with pneumatic transport and wood collection	CD7	One simple cyclone (106 inches in diameter)
			BF6	One bagfilter (948 square feet of filter area)
11-13	WW-8, WW-9, and WW-10	Miscellaneous woodworking operations	BF8, BF9, and BF10	Three bagfilters (5,750 square feet of filter area, one each)

## **SECTION 2- SPECIFIC LIMITATIONS AND CONDITIONS**

### **2.1- Emission Source(s) and Control Devices(s) Specific Limitations and Conditions**

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, record keeping, and reporting requirements as specified herein:

#### **A.**

- **New hanging line No. 1 (NHL1S) consisting of:**
  - Stage 1 stain booths (Nos. Stage1.1 and Stage1.2)
  - Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
  - Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
  - Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
  - Stage 5 topcoat booths (Nos. Stage5.1 and Stage 5.2)
  - Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage 6.1 and Stage 6.2)
  - Paint spray booth (No. NHL-4A)
  - Paint spray booth (No. SB-R1)
  - Washoff tank (No. ESWO1)
- **New hanging line No. 2 (NHL2S) consisting of:**
  - Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
  - Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
  - Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
  - Stage 5 topcoat booths (Nos. Stage5.1 and Stage5.2)
  - Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)
- **New flat line (NFLS1) consisting of:**
  - Stage 1 roll coaters (Nos. Stage1.1 through Stage1.5)
  - Stage 6 topcoat booths (Nos. Stage6.1 and Stage6.2)
  - Stage 7 UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)
- **New flat line consisting of:**
  - Roll coaters (Nos. UVRC1 through UVRC4)
  - Spray booths (Nos. SB1 and SB2)
  - Off-line spray booth (No. ECD-SB13)
- **Old Shipping Warehouse consisting of:**
  - Flat line dry filter type spray booth (ID No. NFLS-4) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-2) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-5) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-3) and one steam-heated drying oven
  - Two stain wiping machines (ID Nos. SWM-1 & SWM-2)
  - Four washoff tanks (ID Nos. ESWO2 through ESWO5)
- **Existing (Old) flat line No. 1 (EFL1) consisting of:**
  - Baffle type sealer booth (No. SB3)
  - Baffle type varnish booth (No. SB4)
- **Existing (Old) flat line No. 3 (EFL3) consisting of:**
  - Baffle type stain booth (No. SB8)
  - Baffle type sealer booth (No. SB9)
  - Baffle type varnish booth (No. SB10)

- **Off-Line Spray Booths and Roll Coaters consisting of:**
  - Paint spray booths (ID Nos. ECD-SB11a, GL-SB11b, and SB12)
  - Roll coaters (ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19)
  - Glaze Line No. 2 (GL) consisting of: Paint spray hanging line (No. GL-NHL2S-1)
- **Existing main UV line (EMUV) consisting of:**
  - Roll coaters (Nos. RC7 through RC11, RC13, and RC14)
- **Existing short line (ESL) consisting of:**
  - Roll coaters (Nos. RC4, RC5A, RC5B, and RC6)
- **Gluing operation (ID No. ES-Gluing-1)**

The following table provides a summary of limits and standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	Adequate ductwork and properly designed collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Volatile organic compounds	BACT Limits <b>See Section 2.2 A</b>	15A NCAC 02D .0530 (PSD)
Odorous emissions	<b>State-enforceable only</b> <b>See Section 2.2 B</b>	15A NCAC 02D .1806
Hazardous air pollutants	MACT Standards <b>See Section 2.2 D</b>	15A NCAC 02D .1111 (40 CFR Part 63, Subpart JJ)

#### 1. **15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS**

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate ductwork and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

##### **Monitoring** [15A NCAC 02Q .0508(f)]

- b. Particulate matter emissions from the spray booths in finishing lines (**ID Nos. NHL1S, NHL2S, NFLS-2 through 5, EFL1, EFL3, ECD-SB11A, GL-SB11b, and SB12**) shall be controlled by adequate ductwork and properly designed collectors. To ensure compliance, the Permittee shall perform inspections and maintenance. As a minimum, the inspection and maintenance program shall include:
- i. weekly inspection of the spray booths' filters noting the condition; and
  - ii. annual (for each 12-month period following the initial inspection) inspection of the associated ductwork noting structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if the filters are not inspected and maintained.

##### **Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The results of inspection and maintenance required by Section 2.1 A.1.b above shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. the date and time of each recorded action;
  - ii. the results of each inspection; and
  - iii. the results of maintenance performed on any filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit the results of any maintenance performed on the filters or ductwork within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities required by Sections 2.1 A.1.b and c above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISIONS**

- a. Visible emissions from the spray booths in finishing lines (**ID Nos. NHL1S, NHL2S, NFLS-2 through 5, EFL1, EFL3, ECD-SB11A, GL-SB11b, and SB12**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a month the Permittee shall observe the emission points of the spray booths in finishing lines (**ID Nos. NHL1S, NHL2S, NFLS-2 through 5, EFL1, EFL3, ECD-SB11A, GL-SB11b, and SB12**) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of these emission sources in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.2.a above.

The Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521 if the required monthly observations are not conducted as required, if the above-normal emissions are not corrected within the monitoring period, or the percent opacity demonstration cannot be made.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring required by Section 2.1 A.2.c above shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities required by Sections 2.1 A.2.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**B.**

- **Three miscellaneous woodworking operations (ID Nos. WW-8, WW-9, WW-10) with associated bagfilters (ID Nos. BF8, BF9, and BF10, respectively)**
- **One wood waste/wood dust collection and storage system (ID No. WWCS1) consisting of group processes controlled with four associated cyclones (ID Nos. CD1, CD2, CD4, and CD5 respectively) installed in series with one bagfilter (ID No. BF1), with four associated bagfilters (ID Nos. BF2, BF3, BF4, BF5, respectively), and two cyclones (ID Nos. CD3 and CD6, respectively) which normally operate closed loop, with ambient vents on each cyclone that could vent to ambient air in an emergency**
- **One enclosed auger type wood chip truck load-out operation (ID No. TL1)**
- **One wood hog (ID No. ESWH1) with associated collection cyclone (ID No. CD7) in series with one bagfilter (ID No. BF6)**

The following table provides a summary of limits and standards for the emission source(s) described above.

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
Particulate emissions	Adequate ductwork and properly designed collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Particulate matter	(ID Nos. BF2 and BF3 only) Compliance Assurance Monitoring	15A NCAC 02D .0614

**1. 15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS**

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate ductwork and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

**Monitoring** [15A NCAC 02Q .0508(f)]

- b. Particulate matter emissions from these sources (**ID Nos. WW-8, WW-9, WW-10, WWCS1, TL1, and ESWH1**) shall be controlled by cyclones (**ID Nos. CD1 through CD7**) and bagfilters (**ID Nos. BF1 through BF6 and BF8 through BF10**) as described above. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
- monthly external inspection of the ductwork, cyclones, and/or bagfilters noting the structural integrity; and
  - annual (for each 12-month period following the initial inspection) internal inspection of the bagfilters noting the structural integrity and the condition of the filters.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if the ductwork, cyclones, and/or bagfilters are not inspected and maintained.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The results of inspection and maintenance required by Section 2.1 B.1.b above for the cyclones and bagfilters shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- the date and time of each recorded action;
  - the results of each inspection; and
  - the results of maintenance performed on any control device.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities required by Sections 2.1 B.1.b and c above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources (**ID Nos. WW-8, WW-9, WW-10, WWCS1, TL1, and ESWH1**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in a 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of these sources (**ID Nos. WW-8, WW-9, WW-10, WWCS1, TL1, and ESWH1**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 B.2.a above.

The Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521 if the required weekly observations are not conducted as required, if the above-normal emissions are not corrected within the monitoring period, or the percent opacity demonstration cannot be made.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring required by Section 2.1 B.2.c above shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping required by Sections 2.1 B.2.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.



**3. 15A NCAC 02D .0614: COMPLIANCE ASSURANCE MONITORING**

- a. For this emission source (**ID No. WWCS1**) and associated fabric filters (**ID Nos. BF2 and BF3**), the Permittee shall comply with 40 CFR Part 64 pursuant to 15A NCAC 02D .0614 to assure that the listed sources comply with the emission limits of 15A NCAC 02D .0512.
- b. To assure compliance with 15A NCAC 02D .0512, particulate emissions from this source (**ID No. WWCS1**) shall be controlled by fabric filters (**ID Nos. BF2 and BF3**).

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. The key elements of the monitoring approach are presented in the following table:

Performance Indicators	Parameter
I. Indicator	Visible emissions
Measurement Approach	Visible emissions from the fabric filters will be monitored daily using EPA Reference Method 22-like procedures
II. Indicator Range	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement.
Quality Improvement Plan ("QIP") Threshold	The QIP threshold is five excursions in a 6-month period.
III. Performance Criteria	
A. Data Representativeness	Measurements are being made at the emission point (fabric filter outlet).
B. Verification of Operational Status	NA
C. QA/QC Practices	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.
D. Monitoring Frequency	Observations are done daily.
Data Collection Procedures	Visible emissions observations are documented by the observer.
Averaging Periods	NA

**Reporting** [15A NCAC 02Q .0508(f)]

- d. Per 64.6(e), the Permittee shall submit compliance assurance monitoring in the form of an administrative amendment that satisfies Parts 64.3 and 64.4, including the establishment of normal operating ranges of the control devices, within 180 days of startup of each or all control devices (**ID Nos. BF8, BF9, and BF10**). If the Permittee does not submit the monitoring or if DAQ disapproves the submittal, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0614.
- e. The Permittee shall submit a summary report of all monitoring activities given in Sections 2.1 B.3.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year period for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

## C.

- **New hanging line No. 1 (NHL1S) consisting of:**
  - Natural gas-fired ovens (Nos. Oven.1 through Oven.5)
  - Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)
- **New hanging line No. 2 (NHL2S) consisting of:**
  - Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)
- **New flat line (NFLS1) consisting of:**
  - Steam heated drying ovens (Nos. Oven.1 through Oven.5)
  - Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)
- **New flat line consisting of:**
  - Natural gas-fired oven (No. Oven.6)
  - Ultraviolet light drying ovens (Nos. UVDO1 through UVDO4)
- **Old Shipping Warehouse consisting of:**
  - Four steam-heated drying ovens associated with Flat line dry filter type spray booths (ID Nos. NFLS-4, NFLS-2, NFLS-5 and NFLS-3)
- **Existing (Old) flat line No. 1 (EFL1) consisting of:**
  - Steam heated drying ovens (Nos. DO1 through DO4)
- **Existing (Old) flat line No. 3 (EFL3) consisting of:**
  - Steam heated drying ovens (Nos. DO8 through DO10)
- **Existing main UV line (EMUV) consisting of:**
  - Steam heated drying ovens (Nos. DO12 and DO14)
- **Existing short line (ESL) consisting of:**
  - Steam heated drying ovens (Nos. DO11 and DO17)

The following table provides a summary of limits and standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521

**1. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFL.Oven.6, Four Ovens (associated with ID Nos. NFLS-4, NFLS-2, NFLS-5 and NFLS-3), NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFLS4.Oven.6, NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**).

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFLS4.Oven.6, NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a month the Permittee shall observe the emission points of these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFLS4.Oven.6, NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 C.2.a above.

The Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521 if the required monthly observations are not conducted as required, if the above-normal emissions are not corrected within the monitoring period, or the percent opacity demonstration cannot be made.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring required by Section 2.1 C.2.c above shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping required by Sections 2.1 C.2.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**D. One wood fuel-fired boiler (ID No. B2)**

The following table provides a summary of limits and standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.61 pounds per million Btu heat input	15A NCAC 02D .0504
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521
N/A	Initial notification requirements. The Permittee shall record and maintain records of the amounts of each fuel fired during each day.	15A NCAC 02D .0524 (40 CFR Part 60, Subpart Dc)
Hazardous Air Pollutants	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	15A NCAC 02D .1111 (40 CFR Part 63, Subpart 5D)

**1. 15A NCAC 02D .0504: PARTICULATES FROM WOOD BURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from the combustion of adulterated/unadulterated wood that are discharged from this source (**ID No. B2**) into the atmosphere shall not exceed 0.61 pounds per million Btu heat input.
- b. In no case shall this source (**ID No. B2**) burn any chlorinated or non-chlorinated plastics and/or resins, or any wood waste which has been adulterated by finishes and/or coatings whose solid content contains compounds containing chlorine.

**Testing** [15A NCAC 02Q .0508(f)]

- c.
  - i. The Permittee has demonstrated initial compliance with the emission limit given in Section 2.1 D.1.a via stack testing (test tracking number 2018-272ST).
  - ii. If additional emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504. If the results of this test are above the limit given in Section 2.1 D.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.

**Monitoring** [15A NCAC 02Q .0508(f)]

- d. Particulate matter emissions from this source (**ID No. B2**) shall be controlled by one multicyclone (**ID No. FA2**) in series with one electrostatic precipitator (**ID No. ESP1**). To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement must include the following:
  - i. a monthly external visual inspection of the system ductwork and material collection unit for leaks; and
  - ii. an annual (for each 12-month period from initial inspection) internal inspection of the multicyclone's structural integrity.
- e. The Permittee shall monitor and record the minimum primary voltage and minimum current through the electrostatic precipitator (**ID No. ESP1**) for each day of the calendar year that the boiler (**ID No. B2**) is operated. The Permittee shall be allowed three days of absent observations per semiannual period.
  - i. The minimum primary voltage is 88 volts; and
  - ii. The minimum current is 1.4 amps.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504 if the monitoring and maintenance requirements in Sections 2.1 D.1.d and e are not followed.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- f. Records of monitoring, maintenance, and inspection activities required by Sections 2.1 D.1.d and e above shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. a report of any maintenance performed on the multicyclone and electrostatic precipitator (**ID Nos. FA2 and ESP1**); and
  - iv. any variance from manufacturer's recommendations, if any, and corrections made.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- g. Within 30 days of a written request from the DAQ, the Permittee shall submit a report of any maintenance performed on the multicyclone and electrostatic precipitator (**ID Nos. FA2 and ESP1**).
- h. The Permittee shall submit a summary report of monitoring and recordkeeping activities required by Sections 2.1 D.1.d, e, and f above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from this source (**ID No. B2**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with the standard.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of wood fuel in this source (**ID No. B2**).

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from this source (**ID No. B2**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, because the Permittee operates a continuous opacity monitoring system ("COMS"), the Permittee may exceed the opacity standard, provided that:
  - i. No more than four six-minute periods exceed the opacity standard in any one day;
  - ii. The percent of excess emissions (defined as the percentage of monitored operating time in a calendar quarter above the opacity limit) does not exceed 0.8 percent of the total operating hours. If this source (**ID No. B2**) operates less than 500 hours during a calendar quarter, the percent of excess emissions shall be calculated by including hours operated immediately previous to this quarter until 500 operational hours are obtained; and
  - iii. The excess emissions exempted by Sections 2.1 D.3.a.i and ii above do not cause or contribute to a violation of any other emission standard.

[15A NCAC 02D .0521(g)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f); 15A NCAC 02D .0521(g)]

- c. i. The Permittee shall install, operate, and maintain a COMS associated with this source (**ID No. B2**) as required by Section 2.1 D.5 below.
- ii. Compliance with the opacity limit shall be determined excluding startups, shutdowns, maintenance periods when fuel is not being combusted, and malfunctions approved as such according to procedures approved under 15A NCAC 02D .0535.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if the COMS data shows an exceedance of the limit in Section 2.1 D.3.a above and/or if the COMS is not operated and maintained.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall maintain a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. Data gathered by the COMS;
  - ii. For each calendar day, the number of exceedances of the opacity standard in Section 2.1 D.3.a;
  - iii. For each calendar quarter, the percent of excess opacity emissions; and
  - iv. The results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a report postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. At a minimum, the report shall contain:
  - i. The percent of excess opacity emissions for each calendar quarter in the reporting period;
  - ii. The number of days in the reporting period wherein four or more six-minute periods exceeded the opacity limit, or a statement that no such days occurred, as applicable; and
  - iii. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02D .0524: NEW SOURCE PERFORMANCE STANDARDS  
(40 CFR PART 60, Subpart Dc)**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards" as promulgated in 40 CFR Part 60 Subpart Dc, including Subpart A "General Provisions."

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- b. In addition to any other recordkeeping required by 40 CFR 60.48c or recordkeeping requirements of the EPA, the Permittee shall record and maintain records of the amounts of each fuel fired during each day. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if these records are not maintained.

**5. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY  
(40 CFR Part 63, Subpart DDDDD; "Subpart 5D")**

**Applicability** [40 CFR 63.7485, §63.7490(b), §63.7499(d)]

- a. For **this source (ID Nos. B2)** (*i.e., new units designed to burn kiln dried biomass/bio-based solid, greater than 10 million Btu per hour, equipped with an oxygen trim system*), the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" and Subpart A "General Provisions."

**Definitions and Nomenclature** [§63.7575]

- b. For the purpose of this permit condition, the definitions and nomenclature contained in §63.7575 shall apply.

**40 CFR Part 63 Subpart A General Provisions** [§63.7565]

- c. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A General Provisions according to the applicability of Subpart A to such sources as identified in Table 10 to 40 CFR Part 63, Subpart DDDDD.

**General Compliance Requirements** [§63.7505(a), §63.7500]

- d. At all times the affected unit is operating, the Permittee shall be in compliance with the emission standards in Section 2.1 D.5.f, except during periods of startup and shutdown. During startup and shutdown, the Permittee shall comply only with items 5 and 6 of Table 3 of Subpart 5D.
- e. At all times, then Permittee shall operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Emission Limits** [15A NCAC 02Q .0508(f), §63.7500(a)(1), Table 1]

- f. The affected units shall meet the following emission limits:

<b>Pollutant</b>	<b>Emission Limit</b>
Hydrochloric Acid (HCl)	2.2E-02 pounds per MMBtu of heat input
Mercury (Hg)	8.0E-07 pounds per MMBtu of heat input
Carbon monoxide (CO)	460 ppm by volume on a dry basis corrected to 3 percent oxygen
Filterable Particulate Matter (PM); or Total Suspended Metals (TSM)	3.0E-02 pounds per MMBtu of heat input; or 4.0E-03 pounds per MMBtu of heat input

**Testing** [15A NCAC 02Q .0508(f)]

- g. i. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ.
- ii. The Permittee conducted the initial performance test on June 7 and September 18, 2018 (test reference numbers 2017-357ST and 2018-272ST).
- iii. The Permittee shall conduct subsequent performance tests as necessary according to §63.7515:
- (A) Except as provided in Paragraphs (B) and (C) below, all applicable performance tests shall be conducted on an annual basis. Annual tests shall be conducted no more than 13 months after the previous test.
- (B) If the performance test for a given pollutant (except mercury, see Paragraph (C) below) for at least two consecutive years show that the emissions are at or below 75 percent of the emission limit for that pollutant, and if there are no changes in the operation of the emission source (**ID No. B2**) or associated air pollution control equipment that could increase emissions, the Permittee may choose to conduct performance tests for that pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test.
- (C) The permittee may skip testing for mercury, provided that:
- (1) All other applicable provisions of §63.7515 are met; and
  - (2) performance tests for mercury for at least two consecutive years show that actual emissions are at or below the emission limit for mercury in Section 2.1 D.5.g above.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these tests are not conducted or if test results are above the limits given in Section 2.1 D.5.f above.

**Notifications** [§63.7545(c),(d),(e)]

- h. i. The Permittee has submitted the Initial Notification of Compliance Status on July 31, 2019.
- ii. The Permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if this notification is not submitted.

**Subsequent compliance requirements** [15A NCAC 02Q .0508(f), §63.7515]

- i. The Permittee shall demonstrate continuous compliance with each emission limit and operating limit that applies according to §63.7540. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

**Monitoring Requirements and Operating Limits** [15A NCAC 02Q .0508(f), §63.7525, §63.7500, Table 4 to Subpart 5D]

- j. The Permittee shall:
  - i. install, operate, certify and maintain a continuous opacity monitoring system ("COMS") on the stack according to the procedures in §63.7525(c)(1) through (7) and maintain opacity to less than or equal to 10 percent opacity or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation (daily block average).
  - ii. install, operate, and maintain an oxygen trim system, as defined in §63.7575, with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test. The oxygen level shall be no lower than 7.69 percent. [§63.7525(a)(7)].
  - iii. install, operate and maintain a continuous monitoring system ("CMS") for operating load and maintain the 30-day rolling average operating load of each unit such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test. The 30-day rolling average operating load shall not exceed 13,354 pounds of steam per hour. [Table 7 to Subpart 5D]
  - iv. meet the requirements for CMS as applicable according to §63.7525(d).
  - v. develop a site-specific monitoring plan according to the requirements in §63.7505(d)(1) through (4) for the use of any CMS. [§63.7505(d)].
  - vi. meet the operating limits as follows: Operation above the maximum or below the minimum operating limits shall constitute a deviation of the established operating limits above except during performance tests conducted to determine compliance with the emission limits or to establish new operating limits. Operating limits must be confirmed or reestablished during performance tests. [§63.7540(a)(1)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

**Work Practice Standards** [15A NCAC 02Q .0508(f)]

- k. 5-year tune-up:
  - i. The Permittee shall conduct a tune-up every five years while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the tune-up, as specified below:
    - (A) as applicable, inspect the burner, and clean or replace any components of the burner as necessary. The Permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled or unscheduled shutdown but the burner must be inspected at least once every 72 months.
    - (B) inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
    - (C) inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown).
    - (D) optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject.
    - (E) measure the concentrations in the effluent stream of CO in parts per million, by volume, and



oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

[§63.7500(a), §63.7540(a)(10), (a)(12)]

- ii. Each 5-year tune-up shall be conducted no more than 61 months after the previous tune-up. The initial tune-up shall be conducted no later than 61 months after the initial startup of the source. [§63.7515(d)]
- iii. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [§63.7540(a)(13), §63.7515(g)]
- l. During startup, the Permittee shall:
  - i. operate all CMS during startup.
  - ii. for startup of a boiler or process heater, must use one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis.
  - iii. (*definition (2) of "startup" in §63.7575*) once fuels that are not clean fuels are fed to the boiler, the Permittee shall vent emissions to the main stack(s) and engage all of the applicable control devices so as to comply with the emission limits within 4 hours of start of supplying useful thermal energy. The Permittee must engage and operate PM control within one hour of first feeding fuels that are not clean fuels. The Permittee must start all applicable control devices as expeditiously as possible, but, in any case, when necessary to comply with other standards applicable to the source by a permit limit or a rule other than this subpart that require operation of the control devices. The Permittee must develop and implement a written startup and shutdown plan, as specified in §63.7505(e).
  - iv. comply with all applicable emission limits at all times except during startup and shutdown periods at which time you must meet this work practice. You must collect monitoring data during periods of startup, as specified in §63.7535(b). You must keep records during periods of startup. You must provide reports concerning activities and periods of startup, as specified in §63.7555.
- [Table 3 to Subpart 5D]
- m. During shutdown, the Permittee:
  - i. shall operate all CMS during shutdown.
  - ii. while firing fuels that are not clean fuels during shutdown, the Permittee shall vent emissions to the main stacks and operate all applicable control devices when necessary to comply with other standards applicable to the source that require operation of the control device.
  - iii. if, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, refinery gas, and liquefied petroleum gas.
  - iv. shall comply with all applicable emissions limits at all times except for startup or shutdown periods conforming with this work practice. The Permittee shall collect monitoring data during periods of shutdown, as specified in §63.7535(b). The Permittee shall keep records during periods of shutdown. The Permittee shall provide reports concerning activities and periods of shutdown, as specified in §63.7555.

[Table 3 to Subpart 5D]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Sections 2.1 5.D.k through l are not met.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- n. The Permittee shall:
  - i. keep a copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or compliance report that has been submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]

- ii. keep records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations. [§63.10(b)(2)(viii)]
- iii. maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (A) through (C) below:
  - (A) the concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
  - (B) a description of any corrective actions taken as a part of the tune-up; and
  - (C) the type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
 [§63.7540(a)(10)(vi)]
- iv. for each CMS, keep records according to paragraphs (b)(1) through (5) of §63.7555.
- v. keep records required in Table 8 of Subpart 5D including records of all monitoring data and calculated averages for applicable operating limits, such as opacity, pressure drop, pH, and operating load, to show continuous compliance with each emission limit and operating limit that applies.
- vi. keep the applicable records in paragraphs (d)(1) through (13) of §63.7555.
- vii. keep:
  - (A) records in a form suitable and readily available for expeditious review;
  - (B) each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record;
  - (C) each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee can keep the records offsite for the remaining 3 years.
 [§63.7560, §63.10(b)(1)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- o. i. The Permittee shall submit a compliance report to the DAQ on a semi-annual basis, postmarked on or before January 30 for the preceding six-month period between July and December and July 30 for the preceding six-month period between January and June. The compliance reports shall also be submitted electronically to the EPA via the procedures in §63.7550(h).
- ii. The compliance report shall contain:
  - (A) The information in §63.7550(c) as applicable.
  - (B) For each deviation from an emission limit or operating limit, the report shall contain the information in §§63.7550(d) and (e) as applicable.
- iii. Within 60 days after the date of completing each performance test (defined in §63.2) including any associated fuel analyses and/or CEMS performance evaluation (defined in §63.2) as required by Subpart 5D, the Permittee shall submit the results to the DAQ and also directly to the EPA electronically via the procedures in §63.7550(h).
  - (A) This report must also verify that the operating limits for each boiler or process heater have not changed or provide documentation of revised operating limits established according to §63.7530 and Table 7 to Subpart 5D, as applicable. The reports for all subsequent performance tests must include all applicable information required in §63.7550. [§63.7515(f)]
  - (B) The Permittee shall submit a permit application to the DAQ with this report if the operating limits in Section 2.1 D.5.j need to be revised.

## 2.2- Multiple Emission Source(s) Specific Limitations and Conditions

### A. Sources subject to Prevention of Significant Deterioration ("PSD") requirements:

- **New hanging line No. 1 (NHL1S) consisting of:**
  - Stage 1 stain booths (Nos. Stage1.1 and Stage1.2)
  - Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
  - Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
  - Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
  - Stage 5 topcoat booths (Nos. Stage5.1 and Stage 5.2)
  - Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage 6.1 and Stage 6.2)
  - Paint spray booth (No. NHL-4A)
  - Paint spray booth (No. SB-R1)
  - Washoff tank (No. ESWO1)
  - Natural gas-fired ovens (Nos. Oven.1 through Oven.5)
  - Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)
- **New hanging line No. 2 (NHL2S) consisting of:**
  - Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
  - Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
  - Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
  - Stage 5 topcoat booths (Nos. Stage5.1 and Stage5.2)
  - Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)
  - Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)
- **New flat line (NFLS1) consisting of:**
  - Stage 1 roll coaters (Nos. Stage1.1 through Stage1.5)
  - Stage 6 topcoat booths (Nos. Stage6.1 and Stage6.2)
  - Stage 7 UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)
  - Steam heated drying ovens (Nos. Oven.1 through Oven.5)
  - Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)
- **New flat line consisting of:**
  - Roll coaters (Nos. UVRC1 through UVRC4)
  - Natural gas-fired oven (No. Oven.6)
  - Ultraviolet light drying ovens (Nos. UVDO1 through UVDO4)
  - Spray booths (Nos. SB1 and SB2)
  - Off-line spray booth (No. ECD-SB13)
- **Old Shipping Warehouse consisting of:**
  - Flat line dry filter type spray booth (ID No. NFLS-4) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-2) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-5) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-3) and one steam-heated drying oven
  - Two stain wiping machines (ID Nos. SWM-1 & SWM-2)
  - Four washoff tanks (ID Nos. ESWO2 through ESWO5)
- **Existing (Old) flat line No. 1 (EFL1) consisting of:**
  - Baffle type sealer booth (No. SB3)
  - Baffle type varnish booth (No. SB4)
  - Steam heated drying ovens (Nos. DO1 through DO4)
- **Existing (Old) flat line No. 3 (EFL3) consisting of:**
  - Baffle type stain booth (No. SB8)

- Baffle type sealer booth (No. SB9)
- Baffle type varnish booth (No. SB10)
- Steam heated drying ovens (Nos. DO8 through DO10)
- **Off-Line Spray Booths and Roll Coaters consisting of:**
  - Paint spray booths (ID Nos. ECD-SB11a, GL-SB11b, and SB12)
  - Roll coaters (ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19)
  - Glaze Line No. 2 (GL) consisting of: Paint spray hanging line (No. GL-NHL2S-1)
- **Existing main UV line (EMUV) consisting of:**
  - Roll coaters (Nos. RC7 through RC11, RC13, and RC14)
  - Steam heated drying ovens (Nos. DO12 and DO14)
- **Existing short line (ESL) consisting of:**
  - Roll coaters (Nos. RC4, RC5A, RC5B, and RC6)
  - Steam heated drying ovens (Nos. DO11 and DO17)
- **Gluing operation (ID No. ES-Gluing-1)**

**1. 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. i. The Permittee shall limit annual volatile organic compound ("VOC") emissions to less than 800 tons per consecutive twelve-month period from all VOC emitting sources subject to PSD located at the facility.
- ii. The Permittee shall limit the VOC content of materials used to the following Best Available Control Technology ("BACT") limits:

<b>Product</b>	<b>BACT Limit (pounds of VOC per gallon) (minus H<sub>2</sub>O and exempt solvents)</b>
Transparent stains	7.2
Sealers	6.2
Topcoats	5.5
Basecoats/Primers	6.4
Enamels	5.6
Edge coats	5.0
Fillers	5.0
Booth coater	4.0
Booth prep, stripper	6.8

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- b. Calculations of VOC emissions per month shall be made at the end of each month. VOC emissions shall be determined by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the amounts of VOC containing materials or the VOC emissions are not maintained and recorded.
- c. The highest VOC content of coatings per gallon applied over the calendar year quarter for each stain booth, toner booth, sealer booth, or topcoat booth, the calculations and the total amount of VOC emissions shall be recorded monthly in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the VOC emissions exceed the limit in Sections 2.2 A.1.a.i and ii above.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit a summary report of monitoring and recordkeeping activities required by Sections 2.2 A.1.b and c above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the monthly VOC emissions for the previous 17 months. The emissions shall be calculated for each of the 12-month periods over the previous 17 months.

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**B. Facility-wide affected sources**

**State-enforceable only**

**1. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**

- a. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

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**C. All MACT-affected wood furniture manufacturing operations:**

- **New hanging line No. 1 (NHL1S) consisting of:**
  - Stage 1 stain booths (Nos. Stage1.1 and Stage1.2)
  - Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
  - Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
  - Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
  - Stage 5 topcoat booths (Nos. Stage5.1 and Stage 5.2)
  - Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage 6.1 and Stage 6.2)
  - Paint spray booth (No. NHL-4A)
  - Paint spray booth (No. SB-R1)
  - Washoff tank (No. ESWO1)
- **New hanging line No. 2 (NHL2S) consisting of:**
  - Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
  - Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
  - Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
  - Stage 5 topcoat booths (Nos. Stage5.1 and Stage5.2)
  - Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)
- **New flat line (NFLS1) consisting of:**
  - Stage 1 roll coaters (Nos. Stage1.1 through Stage1.5)
  - Stage 6 topcoat booths (Nos. Stage6.1 and Stage6.2)
  - Stage 7 UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)
- **New flat line (NFLS4) consisting of:**
  - Roll coaters (Nos. UVRC1 through UVRC4)
  - Spray booths (Nos. SB1 and SB2)
  - Off-line spray booth (No. ECD-SB13)
- **Old Shipping Warehouse consisting of:**
  - Flat line dry filter type spray booth (ID No. NFLS-4) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-2) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-5) and one steam-heated drying oven
  - Flat line dry filter type spray booth (ID No. NFLS-3) and one steam-heated drying oven
  - Two stain wiping machines (ID Nos. SWM-1 & SWM-2)
  - Four washoff tanks (ID Nos. ESWO2 through ESWO5)
- **Existing (Old) flat line No. 1 (EFL1) consisting of:**
  - Baffle type sealer booth (No. SB3)
  - Baffle type varnish booth (No. SB4)
- **Existing (Old) flat line No. 3 (EFL3) consisting of:**
  - Baffle type stain booth (No. SB8)
  - Baffle type sealer booth (No. SB9)
  - Baffle type varnish booth (No. SB10)
- **Off-Line Spray Booths and Roll Coaters consisting of:**
  - Paint spray booths (ID Nos. ECD-SB11a, GL-SB11b, and SB12)
  - Roll coaters (ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19)
  - Glaze Line No. 2 (GL) consisting of: Paint spray hanging line (No. GL-NHL2S-1)
- **Existing main UV line (EMUV) consisting of:**
  - Roll coaters (Nos. RC7 through RC11, RC13, and RC14)

- **Existing short line (ESL) consisting of:**
  - **Roll coaters (Nos. RC4, RC5A, RC5B, and RC6)**
- **Gluing operation (ID No. ES-Gluing-1)**

**1. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY  
(40 CFR Part 63, Subpart JJ)**

**APPLICABILITY**

1. The wood furniture manufacturing operations listed above shall comply with all requirements of 15A NCAC 02D .1111 "Maximum Achievable Control Technology" and 40 CFR Part 63 Subpart JJ "National Emission Standards for Wood Furniture Manufacturing Operations." [40 CFR 63.800]

**DEFINITIONS AND NOMENCLATURE**

2. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.801 shall apply.

**REGULATED POLLUTANTS**

3. Volatile Hazardous Air Pollutants ("VHAPs"), Volatile Organic Compounds ("VOCs"), and Organic HAP solvents as defined in 40 CFR 63.801.

**GENERAL PROVISIONS**

4. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A "General Provisions" according to the applicability of Subpart A to such sources, as identified in Table 1 of 40 CFR Part 63, Subpart JJ.

**WORK PRACTICE STANDARDS**

5. The Permittee shall adhere to the work practice standards as specified by 40 CFR 63.803.
  - a. **Recordkeeping Requirements** – The Permittee shall prepare, maintain, and follow a written work practice implementation plan in accordance with 40 CFR 63.806(e) that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards specified in items i. through xi. below:
    - i. **Operator training** – in accordance with 40 CFR 63.803(b),
    - ii. **Inspection and maintenance plan** – in accordance with 40 CFR 63.803(c),
    - iii. **Cleaning and wash-off solvent accounting system** – in accordance with 40 CFR 63.803(d),
    - iv. **Chemical composition of cleaning and wash-off solvents** – in accordance with 40 CFR 63.803(e),
    - v. **Spray booth cleaning** – in accordance with 40 CFR 63.803(f),
    - vi. **Storage requirements** – in accordance with 40 CFR 63.803(g),
    - vii. **Application equipment requirements** – in accordance with 40 CFR 63.803(h). Conventional air spray guns are allowed only when emissions are vented to a control device.
    - viii. **Line cleaning** – in accordance with 40 CFR 63.803(i),
    - ix. **Gun cleaning** – in accordance with 40 CFR 63.803(j),
    - x. **Wash-off operations** – in accordance with 40 CFR 63.803(k), and
    - xi. **Formulation assessment plan** - in accordance with 40 CFR 63.803(l).
  - b. **Reporting Requirements** – The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(8) and 63.807(b). The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(8) and 63.807(c). The Permittee shall follow the reporting requirements in 40 CFR 64.807(e) as required and 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

**FINISHING OPERATIONS**

6. Per 40 CFR 63.804(a)(4), the Permittee has chosen to use both the **compliant coatings** and the **facility averaging** compliance options for the finishing operations listed above.



**Recordkeeping Requirements** – Compliance with each of these options is considered a separate **ALTERNATIVE COMPLIANCE SCENARIO** and the Permittee, prior to using a known non-compliance coating, i.e., knowingly switching from the use of compliant coatings to facility averaging as a compliance scenario, shall record in a logbook (written or electronic format) the scenario under which it is operating.

a. **Emission Limits** – The Permittee shall either:

- i. comply with all provisions of 40 CFR 63.802(a)(1) and 63.804(a)(2) as applicable to the finishing operations listed above. All thinners, stains, washcoats, sealers, topcoats, basecoats, and enamels used at the facility shall meet the emission limitations as detailed in the following table:

Emission Source	Regulated Material	Emission Limitation
Finishing operations	Thinners	10% by weight HAP
	Stains, washcoats, sealers, topcoats, basecoats, and enamels	1.0 lb VHAP/lb solids (or kg VHAP per kg solids), as applied
	Washcoat, basecoat, or enamel formulated on-site	Coatings – 1.0 lb VHAP/lb solids (or kg VHAP per kg solids) Thinners – 3.0% by weight VHAP

OR

- ii. comply with all provisions of 40 CFR 63.802(a)(1) and 63.804(a)(1) as applicable to the finishing operations listed above. The weighted average VHAP content across all coatings, as applied, shall not exceed 1.0 lb VHAP per lb solids (1.0 kg VHAP per kg solids).
- b. **Compliance Procedures and Monitoring Requirements** – The Permittee shall either:
  - i. demonstrate that only compliant thinners are being used and that all stains, washcoats, sealers, topcoats, basecoats, and enamels are compliant, as applied, in accordance with 40 CFR 63.804(g)(2) for Noncontinuous coaters and 40 CFR 63.804(g)(3) for continuous coaters, if applicable.
  - OR
  - ii. demonstrate that the monthly average VHAP content for all finishing materials used at the facility is no greater than 1.0 lb VHAP per lb solids (1.0 kg VHAP per kg solids), as applied, in accordance with 40 CFR 63.804(g)(1).
- c. **Performance Test Method** – EPA Method 311 [40 CFR 63, Appendix A] shall be used to determine the VHAP content of liquid coatings in accordance with 40 CFR 63.805(a).
- d. **Recordkeeping Requirements** – The Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(2), 63.806(h), 63.806(i), and 63.806(j) and either:
  - i. 63.804(g)(2-3) and 63.806(d) when complying with Section 2.2 C.6.a.i above,
  - OR
  - ii. 63.804(g)(1) and 63.806(c) when complying with Section 2.2 C.6.a.ii above.
- e. **Reporting Requirements** – The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.807(b) and either: 40 CFR 63.804(f)(2), when complying with Section 2.2 C.6.a.i above, **OR** 40 CFR 63.804(f)(1), when complying with Section 2.2 C.6.a.ii above. The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.807(c) and either: 40 CFR 63.804(g)(2), when complying with Section 2.2 C.6.a.i above, **OR** 40 CFR 63.804(g)(1), when complying with Section 2.2 C.6.a.ii above. The Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

**CLEANING OPERATIONS**

7. a. **Emission Limits** - The Permittee shall comply with the limits of 40 CFR 63.802(a)(3) applicable to the strippable spray booth operations as detailed in the following table:

Emission Source	Regulated material	Emission Limitation
Finishing operations	strippable spray booth coatings	0.8 lb VOC per lb solids (or kg VOC/kg solids), as applied

- b. **Compliance Procedures and Monitoring Requirements** - The Permittee shall demonstrate that only compliant strippable spray booth coatings are used in accordance with 40 CFR 63.804(g)(7).
- c. **Performance Test Method** - EPA Method 311 [40 CFR Part 63 Appendix A] shall be used to determine the VHAP content of liquid coatings in accordance with 40 CFR 63.805(a).
- d. **Recordkeeping Requirements** - The Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(3), 63.806(h), 63.806(i), and 63.806(j).
- e. **Reporting Requirements** - The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(7) and 63.807(b). The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(7) and 63.807(c). The Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

**CONTACT ADHESIVE OPERATIONS**

8. a. **Emission Limits** - The Permittee shall comply with all provisions of 40 CFR 63.802(a)(2) and 63.804(b-c) as applicable to the contact adhesive operation as detailed in the following table:

Emission Source	Regulated material	Emission Limitation
Gluing operations	Foam contact adhesives used in products which meet flammability requirements per California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies	1.8 lb VHAP per lb solids (or kg VOC/kg solids), as applied
	All other contact adhesives	1.0 lb VHAP/lb solids (or kg VOC/kg solids), as applied

- b. **Compliance Procedures and Monitoring Requirements** - When emission source is using foam and other contact adhesives, the Permittee shall demonstrate that only compliant adhesives are used in accordance with 40 CFR 63.804(g)(5).
- c. **Performance Test Method** - EPA Method 311 [40 CFR Part 63 Appendix A] shall be used to determine the VHAP content of liquid coatings in foam and other contact adhesives in accordance with 40 CFR 63.805(a).
- d. **Recordkeeping Requirements** - When foam and other contact adhesives are used, the Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(2), 63.806(h), 63.806(i), and 63.806(j).

- e. **Reporting Requirements** - When foam and other adhesives are used, the Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(5) and 63.807(b). When foam and other contact adhesives are used, the Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(5) and 63.807(c). When foam and other contact adhesives are used, the Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

#### **FORMALDEHYDE REQUIREMENTS**

9. The permittee shall comply with one of the following two options:
- a. Option #1 (400 lb formaldehyde limit per rolling 12 month period) –
- Emissions Limits** – In accordance with 40 CFR 63.802(a) and (b), limit total formaldehyde ( $F_{\text{total}}$ ) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.
  - Compliance Procedures and Monitoring Requirements** – In accordance with 40 CFR 63.804(h), calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 5 and maintain a value of  $F_{\text{total}}$  no more than 400 pounds per rolling 12 month period.
  - Recordkeeping Requirements** – In accordance with 40 CFR 63.806(b), the Permittee shall keep records of the formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits of 40 CFR 63.802(a) and (b).
  - Reporting Requirements** - The Permittee shall submit semi-annual reports to the Regional Supervisor in accordance with 40 CFR 63.807(c).
- b. Option#2 ( $\text{CPDS} \leq 1.0\%$  by weight formaldehyde) –
- Emissions Limits** – In accordance with 40 CFR 63.802(a) and (b), use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations. *Low-formaldehyde* means, in the context of a coating or contact adhesive, a product concentration of less than or equal to 1.0 percent formaldehyde by weight, as described in a certified product data sheet for the material.
  - Compliance Procedures and Monitoring Requirements** – In accordance with 40 CFR 63.804(h), demonstrate compliance by use of coatings and contact adhesives only if they are *low-formaldehyde* coatings and contact adhesives maintaining a certified product data sheet for each coating and contact adhesive used and submitting a compliance certification with the semi-annual report.
  - Recordkeeping Requirements** – In accordance with 40 CFR 63.806(b), the Permittee shall keep a certified product data sheet for each coating and contact adhesive used.
  - Reporting Requirements** - The Permittee shall submit semi-annual reports to the Regional Supervisor in accordance with 40 CFR 40 CFR 63.807(c) and 40 CFR 63.804(h). The compliance certification shall state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact adhesive that is not low-formaldehyde, as demonstrated by records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

## 2.3- Permit Shield for Nonapplicable Requirements

The Permittee is shielded from the following nonapplicable requirements [15A NCAC 02Q .0512(a)(1)(B)].

- A. NC Air Toxics Removal of toxic limitations per SESSION LAW 2012-91 – HOUSE BILL 952 – All reference to NC toxics will be removed from the facility's permit per NC Session Law 2012-91 as requested by the facility as a result of this modification (Application No. 4100854.14B); thus, removal of the 15A NCAC 02D .1100 emission limits for MEK, toluene, xylene, ethyl acetate, and MIBK for the following sources does not present any unacceptable health risk as discussed in detail in the review for issued Air Quality Title V Permit No. 03238T21:

Existing (Old) flat line No. 1 (**EFL1**) consisting of:

Baffle type stain booths (**Nos. SB1 and SB2**)

Baffle type sealer booth (**No. SB3**)

Baffle type varnish booth (**No. SB4**)

Existing (Old) flat line No. 3 (**EFL3**) consisting of:

Baffle type stain booth (**No. SB8**)

Baffle type sealer booth (**No. SB9**)

Baffle type varnish booth (**No. SB10**)

Off-Line Spray Booths and Roll Coaters consisting of:

Paint spray booths (**ID Nos. ECD-SB11a, GL-SB11b, SB12, and ECD-SB13**)

Roll coaters (**ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19**)

Existing main UV line (**EMUV**) consisting of:

Roll coaters (**Nos. RC8 through RC11, RC13, and RC14**)

## SECTION 3- GENERAL CONDITIONS (version 5.3, 08/21/2018)

This section describes terms and conditions applicable to this Title V facility.

A. **General Provisions** [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]

1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02Q.
2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.
3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of Department of Environmental Quality upon request.

C. **Severability Clause** [15A NCAC 02Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [15A NCAC 02Q .0507(e) and 02Q .0508(i)(16)]

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance  
North Carolina Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. **Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 02Q .0514]  
The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02Q .0514.
2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505]  
The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q .0524 and 02Q .0505.
3. Minor Permit Modifications [15A NCAC 02Q .0515]  
The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.
4. Significant Permit Modifications [15A NCAC 02Q .0516]  
The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.
5. Reopening for Cause [15A NCAC 02Q .0517]  
The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Reporting Requirements  
Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application;
  - b. changes that modify equipment or processes; or
  - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]
  - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
  - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
    - i. the changes are not a modification under Title I of the Federal Clean Air Act;
    - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
    - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
    - iv. the Permittee shall attach the notice to the relevant permit.
  - c. The written notification shall include:
    - i. a description of the change;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.
  - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
3. Off Permit Changes [15A NCAC 02Q .0523(b)]  
The Permittee may make changes in the operation or emissions without revising the permit if:
  - a. the change affects only insignificant activities and the activities remain insignificant after the change; or
  - b. the change is not covered under any applicable requirement.
4. Emissions Trading [15A NCAC 02Q .0523(c)]  
To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).

**I.A. Reporting Requirements for Excess Emissions and Permit Deviations** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

**"Excess Emissions"** - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. (*Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.*)

**"Deviations"** - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.

**Excess Emissions**

1. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
2. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
  - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
    - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
      - name and location of the facility;
      - nature and cause of the malfunction or breakdown;
      - time when the malfunction or breakdown is first observed;
      - expected duration; and
      - estimated rate of emissions;
    - ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
    - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

**Permit Deviations**

3. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
  - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535 quarterly. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

**I.B. Other Requirements under 15A NCAC 02D .0535**

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

**J. Emergency Provisions** [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

1. An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3. below are met.
3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
  - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. the permitted facility was at the time being properly operated;
  - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
  - d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

K. **Permit Renewal** [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least six months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.

L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. **Duty to Provide Information (submittal of information)** [15A NCAC 02Q .0508(i)(9)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 02Q .0508(f) and 02Q .0508 (l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions limitations, standards, or work practices. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall



comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. whether compliance was continuous or intermittent; and
4. the method(s) used for determining the compliance status of the source during the certification period.

**Q. Certification by Responsible Official [15A NCAC 02Q .0520]**

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**R. Permit Shield for Applicable Requirements [15A NCAC 02Q .0512]**

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
  - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
  - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
  - c. the applicable requirements under Title IV; or
  - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

**S. Termination, Modification, and Revocation of the Permit [15A NCAC 02Q .0519]**

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

**T. Insignificant Activities [15A NCAC 02Q .0503]**

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

**U. Property Rights [15A NCAC 02Q .0508(i)(8)]**

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

**V. Inspection and Entry [15A NCAC 02Q .0508(l) and NCGS 143-215.3(a)(2)]**

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
  - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. **Confidential Information** [15A NCAC 02Q .0107 and 02Q .0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 02Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.

AA. **Standard Application Form and Required Information** [15A NCAC 02Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.

BB. **Financial Responsibility and Compliance History** [15A NCAC 02Q .0507(d)(3)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 02Q .0501(d)]

1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 02Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. **Prevention of Accidental Releases General Duty Clause - Section 112(r)(1) – FEDERALLY-ENFORCEABLE ONLY**

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

FF. **Title IV Allowances** [15A NCAC 02Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. **Air Pollution Emergency Episode** [15A NCAC 02D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.

HH. **Registration of Air Pollution Sources** [15A NCAC 02D .0202]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).

II. **Ambient Air Quality Standards** [15A NCAC 02D .0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. **General Emissions Testing and Reporting Requirements** [15A NCAC 02Q .0508(i)(16)]

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .0912, .1110, .1111, or .1415 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
  - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
    - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
    - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
    - iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in this Section if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
  - b. The Director may authorize the Division of Air Quality to conduct independent tests of any source subject to a rule in this Subchapter to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the Division of Air Quality using the appropriate testing procedures described in Section 02D .2600 has precedence over all other tests.

**KK. Reopening for Cause** [15A NCAC 02Q .0517]

1. A permit shall be reopened and revised under the following circumstances:
  - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
  - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
  - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. the Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

**LL. Reporting Requirements for Non-Operating Equipment** [15A NCAC 02Q .0508(i)(16)]

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. When permitted equipment is not in operation, the requirements for testing, monitoring, and recordkeeping are suspended until operation resumes.

**MM. Fugitive Dust Control Requirement** [15A NCAC 02D .0540]

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas, stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

**NN. Specific Permit Modifications** [15A NCAC 02Q .0501 and .0523]

1. For modifications made pursuant to 15A NCAC 02Q .0501(b)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
2. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA - Air Planning Branch, 61 Forsyth Street SW, Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:
  - a. a description of the change at the facility;
  - b. the date on which the change will occur;
  - c. any change in emissions; and
  - d. any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

OO. **Third Party Participation and EPA Review** [15A NCAC 02Q .0521, .0522 and .0525(7)]

For permits modifications subject to 45-day review by the federal Environmental Protection Agency (EPA), EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.

DRAFT

## ATTACHMENT

**List of Acronyms**

<b>AOS</b>	Alternative Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>Btu</b>	British thermal unit
<b>CAA</b>	Clean Air Act
<b>CAIR</b>	Clean Air Interstate Rule
<b>CEM</b>	Continuous Emission Monitor
<b>CFR</b>	Code of Federal Regulations
<b>DAQ</b>	Division of Air Quality
<b>DEQ</b>	Department of Environmental Quality
<b>EMC</b>	Environmental Management Commission
<b>EPA</b>	Environmental Protection Agency
<b>FR</b>	Federal Register
<b>GACT</b>	Generally Available Control Technology
<b>HAP</b>	Hazardous Air Pollutant
<b>MACT</b>	Maximum Achievable Control Technology
<b>NAA</b>	Non-Attainment Area
<b>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAP</b>	National Emission Standards for Hazardous Air Pollutants
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NSPS</b>	New Source Performance Standard
<b>OAH</b>	Office of Administrative Hearings
<b>PM</b>	Particulate Matter
<b>PM<sub>10</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
<b>POS</b>	Primary Operating Scenario
<b>PSD</b>	Prevention of Significant Deterioration
<b>RACT</b>	Reasonably Available Control Technology
<b>SIC</b>	Standard Industrial Classification
<b>SIP</b>	State Implementation Plan
<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>tpy</b>	Tons Per Year
<b>VOC</b>	Volatile Organic Compound